

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

STEFANO GRANATA; CAMERON PROSPERI;  
THE GUN RUNNER, LLC; and FIREARMS  
POLICY COALITION, INC.,

Plaintiffs,

v.

ANDREA JOY CAMPBELL, in her official  
capacity as Attorney General of the Commonwealth  
of Massachusetts; and TERRENCE M. REIDY, in  
his official capacity as Secretary of the Executive  
Office of Public Safety and Security of the  
Commonwealth of Massachusetts,

Defendants.

CIVIL ACTION  
NO. 1:21-cv-10960-DJC

**PLAINTIFFS' SUPPLEMENTAL BRIEF REGARDING *BONDI V. VANDERSTOK***

At a hearing on the parties' cross-motions for summary judgment in the above-captioned matter on March 26, 2025, the Court invited the parties to submit supplemental briefing regarding the relevance, if any, of the Supreme Court's decision in *Bondi v. VanDerStok*, 604 U.S. ---, 2025 WL 906503 (2025), which it had issued that morning. Plaintiffs respectfully submit that *VanDerStok* is irrelevant to present dispute. *VanDerStok* involved a challenge, under the Administrative Procedure Act, to a Bureau of Alcohol, Tobacco, Firearms and Explosives rule that redefined "firearm" under federal law. *Id.* at \*3. While some of the Respondents did raise a constitutional avoidance argument that implicated the Second Amendment, the Court did not pass upon it, or discuss the Second Amendment in any way, because it found the statutory language unambiguous. *See id.* at \*12.

Dated: April 2, 2025

Respectfully submitted,

Richard C. Chambers, Jr., Esq.  
(BBO# 651251)  
Chambers Law Office

Jason A. Guida  
(BBO# 667252)  
Principe & Strasnick, P.C.

/s/ David H. Thompson  
David H. Thompson  
(*Admitted Pro Hac Vice*)  
Peter A. Patterson  
(*Admitted Pro Hac Vice*)  
William V. Bergstrom  
(*Admitted Pro Hac Vice*)  
COOPER & KIRK, PLLC  
1523 New Hampshire Avenue, N.W.  
Washington, D.C. 20036  
(202) 220-9600  
dthompson@cooperkirk.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that this document filed through the CM/ECF system will be sent electronically to registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 2, 2025.

/s/ David H. Thompson

David H. Thompson  
(*Admitted Pro Hac Vice*)

*Attorney for Plaintiffs*